ORIGINAL

STATE OF ILLINOIS COMMERCE COMMISSION

	203 FEB 20 A	
ompany) ICC Docket No. 02-0864	

Filing to increase Unbundled Loop and Nonrecurring Rates (Tariffs filed December 24, 2002)

COOK COUNTY STATE'S ATTORNEY'S OFFICE PETITION FOR LEAVE TO INTERVENE

NOW COME the COOK COUNTY STATE'S ATTORNEY'S OFFICE by and through RICHARD A. DEVINE, State's Attorney of Cook County, pursuant to the Rules of Practice of the Illinois Commerce Commission, 83 Ill. Admin. Code, Section 200.200 and pray for Leave to Intervene and be made a party in the above-captioned proceeding. In support of this Petition, the COOK COUNTY STATE'S ATTORNEY'S OFFICE state the following:

- 1. That the People of Cook County are utility consumers within the State of Illinois and the State's Attorney represents these consumers in order to assure their utility rates are reasonable and to protect the public interest.
- That the People of Cook County, as utility consumers, will be affected by any order entered by the Commission in this proceeding and that the Cook County State's Attorney's Office is accordingly interested in this proceeding.

3. The State's Attorney has the duty to represent the interests of the People of Cook County and has substantial interest in ensuring that the Order entered in the instant proceeding is consistent with the terms of the Public Utilities act and sound public policy.

WHEREFORE, for the above-stated reasons, the Proposed Intervenor prays that leave to intervene be granted by this Commission and that the COOK COUNTY STATE'S ATTORNEY'S OFFICE be made a party to the above-captioned proceeding.

Respectfully submitted,

RICHARD A. DEVINE State's Attorney of Cook County

Dated: February 19, 2003

Allan Goldenberg

Assistant State's Attorney Environment & Energy Division

MARK N. PERA

Assistant State's Attorney Supervisor Environment & Energy Division

MARIE SPICUZZA

Assistant State's Attorney
Deputy Supervisor
Environment & Energy Division

ALLAN GOLDENBERG

Assistant State's Attorney
Environment & Energy Division
Cook County State's Attorney's Office
69 W. Washington, Suite 700
Chicago, IL 60602

Telephone: (312) 603-8660

Fax: (312) 603-9835

E-mail: agolden@cookcountygov.com

STATE OF ILLINOIS		
)	
COUNTY OF C O O K)	

VERIFICATION

NOW COMES ALLAN GOLDENBERG, who, affirms, deposes and says:

- That he is an Assistant State's Attorney in Cook County assigned to represent the Cook County State's Attorney's Office in any proceedings in connection with the attached PETITION FOR LEAVE TO INTERVENE; and
- 2. That he has read the attached PETITION FOR LEAVE TO INTERVENE and that the facts alleged therein are true and correct to the best of his knowledge and belief.

ALLAN GOLDENBERG

SUBSCRIBED and AFFIRMED to before me this 19th day of February 2003.

Notary Public

OFFICIAL SEAL
DEBORAH ISRAEL
MOTARY PUBLIC STATE OF ILLUMOIS
MY COMPLICATION EXP. DEC. 5,2003

STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION\

Illinois Bell Telephone Company)	ICC Docket No. 02-0864
Filing to increase Unbundled Loop and	Ć	
Nonrecurring Rates (Tariffs filed)	
December 24, 2002))	,

NOTICE OF FILING

TO: See Attached Service List.

PLEASE TAKE NOTICE that on this date February 19, 2003, we have filed by sending by Federal Express today to the Chief Clerk of the Illinois Commerce Commission the enclosed Petition to Intervene and appearances in the above-captioned docket.

RICHARD A. DEVINE

State's Attorney of Cook County

Allan Goldenberg

Assistant State's Attorney

Environment & Energy Division

Cook County State's Attorney's Office

69 W. Washington, Suite 700

Chicago, IL 60602

Telephone: (312) 603-8660

Fax: (312) 603-9835

E-mail: agolden@cookcountygov.com

CERTIFICATE OF SERVICE

I, ALLAN GOLDENBERG, hereby certify that a copy of the enclosed Petition For Leave To Intervene and appearances were served on all parties on the attached list on the 19th day of February 2003 by hand delivery, or Federal Express, or electronic mail, or U.S. first class mail prepaid.

Allan Goldenberg /

Assistant State's Attorney

ICC DOCKET NO. 02-0864

Karl B. Anderson Corporate/Legal Illinois Bell Telephone Company 225 West Randolph, Floor 25D Chicago, IL 60606 E-mail: karl.b.anderson@ameritech.com

Penny Bewick
New Edge Network, Inc.
3000 Columbus House Blvd., Suite 106
Vancouver, WA 98661
E-Mail: pbewick@newedgenetworks.com

Melia Carter
Director, ILEC Relations and External Affairs
Covad Communications Company
227 W. Monroe, 20th Floor
Chicago, IL 60606
E-Mail: mecarter@covad.com

Randolph R. Clarke
Assistant Attorney General
Public Utilities Bureau
Attorney General's Office
100 W. Randolph, 11th Floor
Chicago, IL 60601
E-Mail: rclarke@atg.state.il.us

William J. Cobb III
Senior Counsel
Covad Communications Company
100 Congress Avenue, Suite 2000
Austin, TX 78701
E-Mail: bcobb@covad.com

David R. Conn
Associate General Counsel
McLeodUSA Telecommunications
Services, Inc.
6400 C St., S.W.
P.O. Box 3177
Cedar Rapids, IA 52406-3177
E-Mail: dconn@mcleodusa.com

Karen Coppa
Department of Law
City of Chicago
30 N. LaSalle Street, Suite 900
Chicago, IL 60602-2580
E-Mail: kcoppa@cityofchicago.org

Janice A. Dale
Assistant Attorney General
Public Utilities Bureau
100 W. Randolph Street, 11th Floor
Chicago, IL 60601
E-Mail: jdale@atg.state.il.us

Joseph E. Donovan
Atty. for Covad Communications Company
O'Keefe, Ashenden, Lyons & Ward
30 N. LaSalle Street, Suite 4100
Chicago, IL 60602
E-Mail: joedonovan@keefe-law.com

Jonathan Feipel
Case Manager
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701
E-Mail: jfeipel@icc.state.il.us

ICC DOCKET NO. 02-0864

Carmen Fosco
Office of General Counsel
Illinois Commerce Commission
160 N. LaSalle Street, Suite C-800
Chicago, IL 60601-3104
E-Mail: cfosco@icc.state.il.us

Allan Goldenberg, Mark Pera Marie Spicuzza Assistant State's Attorneys Environment & Energy Division Cook County State's Attorney's Office 69 West Washington St., Suite 700 Chicago, IL 60602

E-Mail: agolden@cookcountygov.com
E-Mail: mspicuz@cookcountygov.com

William A. Haas McLeodUSA Telecommunications Services, Inc. 6400 C St., S.W. P.O. Box 3177 Cedar Rapids, IA 52406-3177 E-Mail: whaas@mcleodusa.com

Cheryl Hamill
Atty.
Law Department
AT&T Communications of Illinois, Inc.
222 W. Adams Street, Suite 1500
Chicago, IL 60606
E-Mail: chamill@att.com

Matthew L. Harvey
Office of General Counsel
Illinois Commerce Commission
160 N. LaSalle Street, Suite C-800
Chicago, IL 60601-3104
E-Mail: mharvey@icc.state.il.us

Peter R. Healy
Manager
CLEC External Relations
TDS Metrocom, LLC
525 Junction Road, Suite 6000
Madison, WI 53717
E-Mail: peter.healy@tdsmetro.com

Andrew O. Isar
Director – State Affairs
Association of Communications Enterprises
7901 Skansie Ave., Suite 240
Gig Harbor, WA 98335
E-Mail: aisar@millerisar.com

Rhonda J. Johnson
Vice President
Regulatory
555 Cook St., Fl. 1E
Springfield, IL 62721
E-Mail: Rhonda.j.Johnson@msg.ameritech.com

Carol Keith
NuVox Communications, Inc.
16090 Swingley Ridge Rd., Suite 500
Chesterfield, MO 63017
E-Mail: ckeith@nuvox.com

Henry T. Kelly
Atty. for Covad Communications Co.
O'Keefe, Ashenden, Lyons & Ward
30 N. LaSalle Street, Suite 4100
Chicago, IL 60602
E-Mail: henrykelly@okeefe-law.com

ICC DOCKET NO. 02-0864

Bruce Levin
Levin Communications, Corp.
1954 First St., Suite 111
Highland Park, IL 60035
E-Mail: blevin@levincom.com

Owen E. MacBride Schiff Hardin & Waite 6600 Sears Tower Chicago, IL 60606 E-Mail: omacbride@schiffhardin.com

M. Gavin McCarty Globalcom, Inc. 333 W. Wacker Drive, Suite 1500 Chicago, IL 60606 E-Mail: gmccarty@global-com.com

Stephen J. Moore
Atty. for Intervenors
Rowland & Moore
77 W. Wacker Drive, Suite 4600
Chicago, IL 60601
E-Mail: steve@telecomreg.com

Gary P. Nuttall
VP, Chief Technical Officer
Sage Telecom, Inc.
805 Central Expressway South, Suite 100
Allen, TX 75013-2789
E-Mail: gnuttall@sagetelecom.net

Mark Ortlieb Illinois Bell Telephone Company 225 W. Randolph, 25D Chicago, IL 60606 E-Mail: mo2753@sbc.com Jack A. Pace
Assistant Corporation Counsel
City of Chicago
30 N. LaSalle Street, Suite 900
Chicago, IL 60602-2580
E-Mail: jpace@ci.chi.il.us.

Carol P. Pomponio
Manager, Regulatory Affairs
XO Illinois, Inc.
Concourse Level
303 E. Wacker
Chicago, IL 60601
E-Mail: carol.pomponio@xo.com

Morton J. Posner Regulatory Counsel Allegiance Telecom, Inc. 1919 M Street, N.W. Suite 420 Washington, DC 20036 E-Mail: morton.posner@algx.com

Doug Price
Case manager
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701
E-Mail: dprice@icc.state.il.us

Kevin D. Rhoda Rowland & Moore 77 W. Wacker, Suite 4600 Chicago, IL 60601 E-Mail: krhoda@telecomreg.com

ICC DOCKET NO. 02-0864

Elizabeth A. Rolando
Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701
E-Mail; erolando@icc.state.il.us

Thomas Rowland Rowland & Moore 77 W. Wacker Drive, Suite 4600 Chicago, IL 60601 E-Mail: tom@telecomreg.com

David O. Rudd
Director, State Governmental Relations
Gallatin River Communications, LLC
625 S. Second Street, Suite 103-D
Springfield, IL 62704
E-Mail: dorudd@aol.com

Susan L. Satter
Illinois Attorney General's Office
11th Floor
100 W. Randolph
Chicago, IL 60601
E-Mail: ssatter@atg.state.il.us

William M. Shay
Atty. for Franklin Square
Communications, Inc.
DeFrees & Fiske
200 S. Michigan Ave., Suite 1100
Chicago, IL 60604
E-Mail: wmshay@defrees.com

Kristen M. Smoot
Director Regulatory Affairs
RCN Telecom Services of Illinois, Inc.
350 N. Orleans Street, Suite 600
Chicago, IL 60654
E-Mail: Kristen.smoot@rcn.net

Mary Stephenson
Office of General Counsel
Illinois Commerce Commission
160 N. LaSalle Street, Suite C-800
Chicago, IL 60601-3104
E-Mail: mstephen@icc.state.il.us

Louise A. Sunderland
Illinois Bell Telephone Company
Floor 25D
225 W. Randolph Street
Chicago, IL 60601
E-Mail: louise.sunderland@ameritech.com

Darrell Townsley
Midwest Region Public Policy
WorldCom Inc.
205 N. Michigan Ave., 11th Floor
Chicago, IL 60601
E-Mail: Darrell.townsley@wcom.com

Jason Wakefield
Atty. for Sage Telecom Inc.
Smith Majcher & Mudge, LLP
816 Congress Ave., Suite 1270
Austin, TX 78701
E-Mail: jwakefield@reglaw.com

ICC DOCKET NO. 02-0864

Nancy Wells
AT&T Communications of Illinois, Inc.
620 S. 5th Street
Springfield, IL 62703
E-Mail: njwells@att.com

Donald L. Woods
Administrative Law Judge
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701
E-Mail: dwoods@icc.state.il.us